

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**RARE BREED TRIGGERS, LLC, and
ABC IP, LLC,**

Plaintiffs,

v.

**THOMAS ALLEN GRAVES,
POWERED BY GRAVES, INC.,
VALOR MANUFACTURING LLC,
VALOR ARMS LLC,
JANEWAY MACHINE, INC.,
JANEWAY LEASING, LLC,
JANEWAY MANUFACTURING INC.,
JANEWAY MACHINE COMPANY, INC.,
7050 CORP.,**

Defendants.

Case No. 22-cv-107-GKF-JFJ

DEFAULT JUDGMENT

On this 15th day of December, 2022, having granted plaintiffs' Second Motion for Default Judgment Against Thomas Allen Graves and Powered By Graves, Inc., the court hereby grants a default judgment in favor of plaintiffs Rare Breed Triggers, LLC, a North Dakota limited liability company, and ABC IP, LLC, a Delaware limited liability company, against defendants Thomas Allen Graves and Powered By Graves, Inc., an Oklahoma corporation, in the following respects:

Defendants Thomas Allen Graves and Powered By Graves, Inc. have infringed Claim 4 of U.S. Patent No. 10,514,223 ("the '223 Patent") by making, using, selling, offering for sale, importing and/or promoting, providing and causing to be used without authority within the United States, the ALAMO-15 forced reset trigger. This infringement was willful.

Defendants Thomas Allen Graves and Powered By Graves, Inc. are hereby permanently enjoined from infringement or contributing to the infringement of the '223 Patent.

Plaintiffs have suffered actual damages in the sum of \$1,308,600, as represented in the Declaration of Cole Leleux [Doc. 52], a sum which is within the fair scope of the allegations in the Complaint. Due to the willful nature of the infringement, plaintiffs are entitled to treble damages. The court therefore grants default judgment in favor of plaintiffs Rare Breed Triggers, LLC and ABC IP, LLC and against defendants Thomas Allen Graves and Powered By Graves, Inc. in the sum of \$3,925,800.

Plaintiffs may seek an award of reasonable attorney fees pursuant to 35 U.S.C. § 285 by filing a motion, brief and affidavit as required by Local Civil Rule 54-2, on or before January 6, 2023.

ENTERED at Tulsa, Oklahoma, this 15th day of December, 2022.


GREGORY K. FRIZZELL
UNITED STATES DISTRICT JUDGE